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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WELLS FARGO BANK, N.A.,
Plaintiff,

vs.

SATICOY BAY LLC – SERIES 3948
APPLECREST, a Nevada limited-liability
company; WOODCREST HOMEOWNERS
ASSOCIATION; a Nevada non-profit
corporation; ABSOLUTE COLLECTION
SERVICES, LLC, a Nevada limited-liability
company; DOES 1 through 10; and ROE
BUSINESS ENTITIES 1 through 10, inclusive,
Defendants.

Case No. 2:17-cv-1360-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO AMEND
PLEADINGS AND ADD PARTIES**

**(First Requested Extension After Lift of
Stay)**

Pursuant to Local Rules 6-1 and 26-4, the parties stipulate, and request that the Court approve, a fourteen-day extension of the deadline to amend pleadings and add parties from May 14, 2019 to May 28, 2019. The parties do not seek any other extension of the existing case deadlines at this time. Wells Fargo is still reviewing information related to the possible elimination and substitution of claims and needs a brief, two-week extension to finalize and file its Amended Complaint. This is the first request (post lift of stay) for an extension of deadlines contained within the discovery plan and scheduling order.

1 This request comes less than twenty-one days before expiration of the current deadline to
2 amend pleadings, and, therefore, must be supported by good cause. Good cause exists to extend the
3 deadline here, as the parties are currently conducting discovery and locating the information needed
4 to finalize their amended pleadings, but need a brief extension to confirm additional information
5 regarding their claims.

6 The parties are amicably, professionally, diligently, and in good faith working toward the
7 completion of discovery in this matter. The request for additional time at this point reflects the
8 need for the parties to plan strategically based on the full factual and legal record -- not any dilatory
9 conduct by any party. The stipulated extension will also eliminate the need for expensive, time-
10 consuming motions for both the parties and the court. No prejudice will result from the requested
11 extension, as the parties currently anticipate that they will be able to complete discovery on or
12 before the August 2019 deadline.

13 For these reasons, and based on the circumstances, the parties request an extension of the
14 dispositive motions deadlines and subsequent deadlines as follows:

15 This stipulated request is submitted in good faith for the reasons explained above, and not
16 for purposes of undue delay.

Dated: May 9, 2019

LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD. SNELL & WILMER L.L.P.

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*Attorneys for Defendant Saticoy Bay LLC Series
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**e-signature affixed with permission*

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*Attorneys for Defendant Woodcrest
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*Attorney for Defendant Absolute Collection
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**e-signature affixed with permission*

**e-signature affixed with permission*

SCHEDULING ORDER

The deadline to amend pleadings and add parties is hereby extended from May 14, 2019 to May 28, 2019. All other current deadlines remain in effect.

IT IS SO ORDERED.



United States Magistrate Judge

Dated: 5-10-2019

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically transmitted the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO AMEND PLEADINGS AND ADD PARTIES** with the Clerk of Court for the U.S. District Court, District of Nevada by using the CM/ECF system for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

DATED: May 9, 2019

/s/ Susan Ballif

An employee of SNELL & WILMER L.L.P.

4819-1705-3078